

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	NO. 3:24-cr-00189
)	
DAVID AARON BLOYED)	JUDGE CRENSHAW

**UNITED STATES' RESPONSE TO DEFENDANT'S MOTIONS IN LIMINE
CONCERNING THREATENING NATURE OF SOCIAL MEDIA POSTS**

Comes now the United States of America, by and through the undersigned Assistant United States Attorney, Joshua A. Kurtzman, and responds to the defendant's motion in limine "concerning threatening nature of social media posts." (DE #59.) The United States avers that the defendant's motion in limine is premature as it baselessly speculates that the United States may attempt to elicit certain testimony at trial. At this stage, the defendant's position seems to be putting the cart before the horse. The United States does not intend to elicit inadmissible testimony from witnesses and, to the best of its ability, is preparing witnesses in a manner to prevent any inadmissible testimony. At trial, should defense counsel believe the United States is asking an improper question or is seeking to elicit inadmissible testimony, the proper time to object is in that moment. However, the United States will seek to elicit testimony regarding how the defendant's threatening communications led them to act, which directly addresses elements of the charge here.

CONCLUSION

For the reasons outlined above, the Defendant's Motion in Limine (DE # 59) should be denied as premature.

Respectfully Submitted,

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